

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO 04-11607 DPW

HEIDI K. ERICKSON
Plaintiff

VERIFIED MOTION TO VACATE ORDERS TO DISMISS

MASSACHUSETTS DEPARTMENT OF AGRICULTURE,
Defendants

Plaintiff, Ms. Erickson, relying on newly issued ORDERS TO EUTHANIZE her beloved, irreplaceable, intrinsically valuable, unique family of purebred Persian cats, issued on 8/18/04.

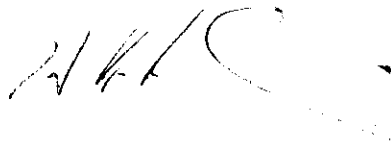
Erickson also relies upon her previously filed Verified Complaint, Motion/Memo for Preliminary Injunction, Response to Defendant's Opposition files Motion for TRO; seeking emergency relief to Stay Orders issued 8/18/04 by Defendant's 'Orders to Euthanize' upon her beloved cats (Ex 1) and to Vacate Dismissal issued on 8/16/04.

Plaintiff states there is no compensation given in such unnecessary Orders to Euthanize and all previous state litigated cases where compensation was given is totally inadequate. Erickson will suffer extreme loss and irreparable harm to her emotionally, physically and nothing could replace her hand raises babies but their safe immediate return.

Plaintiff is unable to seek appropriate relief as she is locally biased, and harassed and requires time to develop the argument in support. Her beloved family of purebred, valuable Persians Ordered to death on Sept. 1st, 2004 is an abuse of Defendant's discretion that they do not have lawfully, and this Court should vacate it's order to dismiss and hear the Plaintiff's claims, issue a stay of these Orders and protect Plaintiff Constitutional rights.

Respectfully submitted by:

Heidi K. Erickson, pro se



By signature herein I have caused the service of this document upon Defendants.